

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

RICHARD FELTZ, on behalf of himself and
all others similarly situated,

Plaintiff,

VS.

BOARD OF COUNTY COMMISSIONERS OF
THE COUNTY OF TULSA; VIC REGALADO,
Tulsa County Sheriff, in his official capacity;
TERRY H. BITTING, TAMMY BRUCE,
MARTHA RUPP CARTER, STEPHEN R.
CLARK, THERESA DREILING, OWEN
EVENS, JAMES W. KEELEY, DEBORAH
LUDI-LEITCH, J. ANTHONY MILLER,
DAWN MOODY, MILLIE OTEY, KIRSTEN
PACE, APRIL SEIBERT, CLIFFORD SMITH
and SARAH SMITH, in their capacity as Tulsa
County Special Judges; WILLIAM
MUSSEMAN, in his capacity as Tulsa
County District Court Judge,

Defendants.

**DEFENDANT STATE JUDGES' NOTICE OF
SUPPLEMENTAL OF AUTHORITY**

Defendant State Judges William LaFortune,¹ in his official capacity as Presiding Judge, and Terry H. Bitting, Tammy Bruce, Martha Rupp Carter, Stephen R. Clark, Theresa Dreiling, Owen Evens, James W. Keeley, Deborah Ludi-Leitch, J. Anthony Miller, Dawn Moody, Millie Otey, Kirsten Pace, April Siebert, Clifford Smith and Sarah Smith, in their capacity as Special Judges, by and through the undersigned counsel, respectfully provide notice to the Court of

¹ Judge LaFortune became presiding judge on January 1, 2020 and was automatically substituted for Judge Musseman pursuant to Fed. R. Civ. P. 25(d); however, all references will be to Judge Musseman when discussing events that happened between January 1, 2018 and December 31, 2019 as Judge Musseman was the presiding judge during that time period and the allegations in the Amended Complaint refer to his personal actions.

supplemental authority. On December 28, 2020, the Fifth Circuit Court of Appeals issued an opinion in *Shannon Daves, et al. v. Dallas County, Texas, et al.*, Case No. 18-11368, which is attached as Exhibit 1 to this Notice. This opinion involves similar claims and issues as those raised by Plaintiff and Defendant State Judges in this case such that the opinion while not binding precedent may be informative for the Court in relation to Doc. Nos. 104 and 173.

Respectfully submitted,

s/ Stefanie E. Lawson

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of January, 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and I further certify that on this date a true and correct copy of the foregoing was served on following who are ECF registrants:

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